

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:	:	Chapter 11
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i> ,	:	
	:	
Debtors.	:	(Jointly Administered)
	-X	

**STIPULATION AND ORDER REGARDING MOTION
BY GENERAL MOTORS LLC, PURSUANT TO RULE 8009(e)(1)
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE, TO
STRIKE CERTAIN DOCUMENTS CONTAINED IN APPELLANTS'
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

The Ignition Switch Plaintiffs,¹ and General Motors LLC (“New GM”), by and through their undersigned counsel, enter into this Stipulation and Agreed Order and state:

WHEREAS, on June 16, 2015, the Ignition Switch Plaintiffs filed with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) the *Appellants’ Statement of Issues on Appeal and Designation of Items to be Included in the Record on Appeal*, dated June 16, 2015 [ECF No. 13219] (the “Statement”);

WHEREAS, on June 29, 2015, New GM filed with the Bankruptcy Court the *Motion by General Motors LLC, Pursuant to Rule 8009(e)(1) of the Federal Rules of Bankruptcy Procedure, to Strike Certain Documents Contained in Appellants’ Designation of Items to be Included in the Record on Appeal*, dated June 29, 2015 [ECF No. 13263] (the “Motion”);

WHEREAS, the Motion sought to strike Documents 201 through 204, 206 through 210, 212 through 219, 221 through 223, and 225 (collectively, the “Additional Documents”) from the Statement;

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to such terms in this Court’s *Judgment*, dated June 1, 2015 [ECF No. 13177] or the Motion, as applicable.

WHEREAS, the Motion set July 9, 2015 as the deadline for the Ignition Switch Plaintiffs to respond to the Motion, and set July 16, 2015 as the hearing date for the Motion; and

WHEREAS, the parties have conferred and agreed that certain of the Additional Documents should be stricken from the Statement.

NOW, THEREFORE, it is stipulated and agreed, by and among the parties, subject to approval of the Bankruptcy Court, that:

1. Documents 202, 203, 204, 206, 208, 210, 212, 213, 216, 217, 218, 219, and 221 shall remain in the Statement.

2. Documents 201, 207, 209, 214, 215, 222, 223, and 225 (collectively, the “**Stricken Documents**”) shall be stricken from the Statement.

3. Within three (3) business days of this Stipulation and Order being approved by the Bankruptcy Court, Designated Counsel shall file with the Bankruptcy Court an amended Statement with the Stricken Documents deleted.²

4. This Stipulation and Order may be executed in one or more counterparts, each of which is deemed an original, together constituting one and the same document. Facsimile signatures or signatures received via e-mail transmission are treated as a binding and original document, and the facsimile signature or e-mail signature of any party is considered an original signature.

[Remainder of page left intentionally blank]

² The form of the amended Statement to be filed with the Bankruptcy Court is attached hereto as **Exhibit A**; a blackline comparing the original Statement with the amended Statement is attached hereto as **Exhibit B**.

Dated: July 8, 2015
New York, New York

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Counsel for General Motors LLC

SO ORDERED:

Dated: New York, New York
July 14, 2015

s/ Robert E. Gerber
HONORABLE ROBERT E. GERBER
UNITED STATES BANKRUPTCY JUDGE